



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OCEAN ASSESSMENTS DIVISION
HAZARDOUS MATERIALS RESPONSE BRANCH
c/o U.S. Environmental Protection Agency
Waste Management Division - HEE-6
J.F. Kennedy Federal Building
Boston, MA 02203
5 June 1991

Ms. Meghan Cassidy
U.S. EPA Waste Management Division
J.F. Kennedy Federal Office Building
Boston, MA 02203

Dear Meghan:

Thank you for the Draft Feasibility Study, Detailed Analysis of Alternatives, Site 8, Brunswick Naval Air Station. A total of four remedial actions addressing soil contamination have been proposed for Site 8. The alternatives under consideration are:

1. No action.
2. Minimal action, including institutional controls and five-year site reviews.
3. Soil cover composed of geotextile fabric, soil, and vegetative layers.
4. Soil excavation, layering, conditioning, and solidification; and on-site backfilling, regrading, and revegetating of treated soils.

Comments

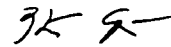
As noted in earlier reviews, concentrations of some contaminants are migrating downstream in the unnamed tributary to the Androscoggin River at levels which may pose potential threats to NOAA trustee habitats and species. Trace elements were detected in soils, groundwater, and seeps from Site 8 at concentrations exceeding applicable screening criteria. Concentrations of lead and PAHs detected in sediments collected from the unnamed tributary to the Androscoggin River downstream of the site exceeded ER-L values. Lead, zinc, and cyanide were detected in surface waters from the unnamed tributary at and downstream of the site at concentrations exceeding freshwater chronic and/or acute AWQC. Although clear gradients of contamination could not be fully established, the results of the data collected during the remedial investigation indicated that contamination is limited primarily to areas near the site, marginally decreases away from the site, and is unlikely to be present at high concentrations in habitats used extensively by NOAA trust resources. However, high levels of lead and cyanide warrant further additional sampling of surface waters and sediments in the vicinity of Site 8.

A target clean-up level of 18 mg/kg for PAHs in soils was proposed in the feasibility study. This target level would be protective of aquatic resources. Approximately 280 cubic meters of contaminated soils would be remediated at the site. Target clean-up levels for trace elements in soils were not proposed in the study.

Although Alternatives 3 and 4 would limit the migration of contaminants to nearby surface waters via erosion control, the proposed remedial actions do not include reducing the concentrations of contaminants detected in groundwater. Since groundwater discharge to the unnamed tributary is one of the primary mechanisms for the off-site transport of contaminants, NOAA is concerned that this discharge to the tributary would continue. Further review should be made regarding the likelihood that removal of contaminated soils will quickly eliminate the groundwater contamination.

Please contact me if you have any questions concerning this review.

Sincerely,

A handwritten signature in dark ink, appearing to read 'JK F', is positioned above the printed name.

Kenneth Finkelstein